

## Telecommunications Advisors

8801 South Yale Avenue, Suite 450 Tulsa, Oklahoma 74137 Telephone 918.496.1444 Fax 918.496.7733

www.beaconbright.com

February 11, 2008

Pottawatomie Telephone Company P. O. Drawer 66 Earlsboro, OK 74840

Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, DC 20554

RE: EB Docket No.06-36

Via: ECFS

Dear Secretary Dortch:

Pursuant to 47 CFR 64.2009(e); please find the accompanying annual CPNI certification and statement for calendar year 2007 for Pottawatomie Telephone Company form 499 filer ID number 807747.

Should you have any questions regarding this filing, please direct them to the undersigned.

Best Regards

Keith Gile Consultant

Cc:

Byron McCoy, Telecommunications Consumer Division, Enforcement Bureau via email byron.mccoy@fcc.gov

Best Copy Printing via email FCC@BCPIWEB.COM

with Sile

## Certification of CPNI Filing December 31, 2007

EB Docket No. 06-36 EB-06-TC-060

I, Matt Overland, hereby certify for calender year 2007 that I am CPNI Compliance officer of Pottawatomie Telephone Company, Inc. and that I have personal knowledge that Pottawatomie Telephone Company, Inc. has established operating procedures that are to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R.§§ 64.2001-2011.

Matt Overla	and
Officer's Nar	me
CPNI Com	pliance Officer
Title	
Signature	hAO O O Ore
2 - 5 Date	5-08

## Pottawatomie Telephone Company, Inc. STATEMENT OF COMPLIANCE WITH CPNI 47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2011

Pottawatomie Telephone Company, Inc. (Pottawatomie) has established operating procedures that ensure compliance with the Federal Communication Commission regulations regarding the protection of consumer proprietary network information (CPNI).

- Pottawatomie has implemented internal procedures to educate and train employees about CPNI and the disclosure of CPNI. Pottawatomie has established disciplinary procedures for any employee that wrongfully discloses CPNI.
- Pottawatomie does not use CPNI without customer notification as set forth by the FCC in 47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2011. Pottawatomie provides either an opt-in notice or an opt-out notice when appropriate and maintains the customers choice. Therefore, the customers approval status can be determined prior to use of CPNI.
- Pottawatomie maintains records of their own and their affiliates' sales and marketing campaigns that use their
  customers' CPNI. Also, Pottawatomie does not currently allow access to third parties for marketing purposes
  but will obtain Op in approval from customers for which it may allow third party access. Pottawatomie will
  maintain records anytime third parties are allowed access to CPNI. Records of their own marketing, thier
  affliate's marketing or any third party relase, include a description of each campaign, the specific CPNI that
  was used, and what products and services were offered. These records are retained for a period of at least one
  year.
- Pottawatomie requires sales personnel to obtain supervisory approval of all outbound marketing requests for customer approval and maintains records of compliance for at least one year.
- Pottawatomie will provide written notice within five business days to the FCC any instance where the opt-out methods do not work properly, to such a degree that the customers inablility to opt-out is more than an anomaly.

Pottawatomie did not experience any apparent attempts by data brokers to obtain CPNI and therefore did not take any action against data brokers during the calender year ended December 31, 2007.

Pottawatomie did not receive any apparent customer complaints concerning the unauthorized release of CPNI for the calender year ended December 31, 2007.